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12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 PAMELA GROGAN, individually,

15 Case No.: 2:17-cv-01044-APG-VCF

16 Plaintiffs,

17 vs.

18 STATE FARM MUTUAL AUTOMOBILE  
19 INSURANCE COMPANY, an entity licensed  
20 to do business in Nevada; DOES I through X;  
21 and ROE CORPORATIONS, XI through XX,  
22 inclusive,

23 **STIPULATION AND ORDER TO**  
**EXTEND DISCOVERY DEADLINES**  
**(Second Request)**

24 Defendants.

25 COMES NOW, Plaintiff, PAMELA GROGAN, by and through her counsel of record,  
26 MARK G. HENNESS, ESQ. and JACOB S. SMITH, ESQ. of the law firm of HENNESS &  
27 HAIGHT and Defendant, STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY,  
28 by and through its counsel of record, BENJAMIN J. CARMAN, ESQ. of the law firm of RANALLI  
ZANIEL FOWLER & MORAN, and submit the following stipulation and order to extend discovery  
deadlines pursuant to LR 26-4 as follows:

29 **1. Summary of Discovery Completed**

30 All parties have provided initial witness lists and documents pursuant to FRCP 26 and  
31 supplements thereto. Plaintiff has executed authorizations served by Defendant. Plaintiff and

1 Defendant had both served written discovery requests on each other, and both parties have  
2 responded to the same. Plaintiff is presently working to schedule the depositions of State Farm  
3 Adjuster, Kim Korich, as well as the 30(b)(6) witness(es) of State Farm. Plaintiff's deposition is  
4 presently set for April 25, 2018.  
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6 **2. Discovery Remaining**

7 The depositions of Plaintiff and Plaintiff's treating doctors must be completed, in addition to  
8 the depositions of State Farm Adjuster Kim Korich and other State Farm designees and witnesses,  
9 as necessary. Additionally, non-party witnesses and the parties' expert witnesses (once disclosed)  
10 need to be taken. To the extent necessary, the parties may also seek to propound additional written  
11 discovery and/or follow up on the discovery already propounded.  
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13 **3. Reason Why Discovery Was Not Completed**

14 Discovery in this matter is currently scheduled to close on June 3, 2018. Additional time is  
15 required to work through scheduling issues so that discovery may be completed. Specifically, the  
16 parties require additional time in order to coordinate the depositions of the Defendant's employees  
17 and corporate representatives. For example, Kim Korich, the claims adjuster who handled the  
18 subject claim, is no longer an employee of Defendant State Farm. Because she is not able to take  
19 leave during business hours at her new employer, Ms. Korich has requested that her deposition be  
20 scheduled for after 6pm or on a Saturday. Plaintiff's counsel is agreeable to accommodating this  
21 request, but needs additional time to make schedule arrangements for an after-hours deposition.  
22 Moreover, as Plaintiff would like to have Ms. Korich's deposition testimony prior to expert  
23 disclosures, the present dates needed to be moved back. This is the parties' second request for an  
24 extension of discovery deadlines in this matter; therefore, the parties have agreed to an extension of  
25 the discovery deadlines by 45 days to enable them to complete the remaining discovery.  
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#### **4. Proposed Schedule for Completing Discovery**

Accordingly, the parties respectfully request that this Court enter an order setting the following discovery plan and scheduling order dates:

<b>Event</b>	<b>Former Deadline</b>	<b>New Deadline</b>
Discovery Deadline	06/13/18	07/27/2018
Motions to Amend Pleadings and Add Parties	03/12/18	04/26/2018
Initial Expert Designations	04/12/18	05/28/2018
Rebuttal Expert Designations	05/14/18	06/28/2018
Dispositive Motions	07/13/18	08/27/2018
Joint Pre-Trial Order	08/13/18	09/27/2018

Counsel further states that the requested extension of the discovery deadline is not intended for purposes of delay, but rather for the purposes set forth hereinabove.

Dated this 3<sup>rd</sup> day of April, 2018.

Dated this 3<sup>rd</sup> day of April, 2018.

## HENNESS & HAIGHT

RANALLI ZANIEL FOWLER & MORAN,  
LLC

/s/ *JACOB S. SMITH, ESO.*

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/s/ *BENJAMIN J. CARMAN, ESO.*

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*Attorneys for Defendant*

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## **ORDER**

IT IS SO ORDERED this 4th day of April, 2018.

UNITED STATES MAGISTRATE JUDGE

Respectfully submitted by:

HENNESS & HAIGHT

/S/ JACOB S. SMITH, ESQ.

MARK G. HENNESS, ESQ.

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